

Exhibit A

**Draft Stipulation and Order to Withdraw Without Prejudice the Motion of
Certain Insurers for Relief from the Automatic Stay to Permit California
Coverage Action to Continue**

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JU835-8355 and JU895-0964*

(additional counsel listed on signature page)

17 **UNITED STATES BANKRUPTCY COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 In re:

21 The Roman Catholic Archbishop of San
Francisco,

22 Debtor and
23 Debtor in Possession.

Case No. 23-30564 (DM)

Chapter 11

**[DRAFT] STIPULATION AND ORDER
TO WITHDRAW WITHOUT
PREJUDICE THE MOTION OF
CERTAIN INSURERS FOR RELIEF
FROM AUTOMATIC STAY TO PERMIT
CALIFORNIA COVERAGE ACTION TO
CONTINUE**

RECITALS

12 A. On October 27, 2023, the Insurers filed the Motion, which seeks to lift the automatic
13 stay to allow a pending state-court coverage action (the “**California Coverage Action**”) to proceed
14 in order to provide guidance and certainty on the extent of the Insurers’ and Debtor’s respective
15 contractual rights and obligations for claims brought by survivors of childhood sexual abuse under
16 the California Child Victims Act against the Archdiocese.

17 B. On November 16, 2023, the Debtor filed an objection (the “**Objection**”) to the
18 Motion.²

19 C. On November 16, 2023, the Official Committee of Unsecured Creditors (the
20 “Committee”) joined the Objection.³

21 D. The Parties have met and conferred with respect to the Insurers' request for relief
22 by the Motion. As a result, the Parties have come to an agreement regarding the relief requested
23 by the Motion.

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

²⁶ *Debtor's Opposition to Motion of Certain Insurers for Relief from Automatic Stay to Permit California Coverage Action to Continue* [Docket No. 313].
²⁷

³ Committee's Joinder to Debtor's Opposition to Motion of Certain Insurers for Relief from Automatic Stay to Permit California Coverage Action to Continue [Docket No. 321].

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT IS HEREBY STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED:

1. The Insurers agree to withdraw the Motion without prejudice.
 2. The Insurers agree that they will not file a renewed motion to lift the stay without providing the Debtor with at least 45-days' prior notice. The Debtor agrees it will not seek to remove the California Coverage Action without providing Insurers with at least 45-days' prior notice.
 3. Neither the Insurers' agreement to withdraw the Motion, nor the pendency of the stay, may be used in any manner (i) to challenge the Insurers' standing, (ii) in opposing any further motion to lift the stay, or (iii) as a waiver, admission, or limitation of any kind with respect to the Insurers' or the Debtor's rights, claims, defenses, or objections in connection with the California Coverage Action or this Bankruptcy Case.
 4. Other than as agreed to above, the Debtor and the Insurers reserve all rights, claims, defenses, and objections.

[SIGNATURE PAGES TO FOLLOW]

1
2 Dated: February [], 2024
3

4 /s/ [DRAFT]
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1 Dated: February [], 2024

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